

Message

From: STURDEVANT Debra [Debra.STURDEVANT@state.or.us]
Sent: 9/9/2019 11:51:02 PM
To: Keating, Jim [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bd5fba58ac5e4efd9f96c1f37ebbe199-JKeating]
CC: STURDEVANT Debra [Debra.STURDEVANT@state.or.us]
Subject: follow up re mercury variance

Hello Jim, I appreciate your thinking about how a variance may work best for mercury. I wanted to clarify one point from today's conversation. When I asked if EPA understood that the 10% aggregate reduction from the TMDL was just the WLA for point sources, I was trying to understand how the HAC would be defined for a waterbody variance. I re-read the rule at 131.14 (b)(1)(ii)(B) (1) and (2). Frankly I am not sure how (B)(2), which is an exact replica of (A)(3), would be determined in the context of a waterbody variance. So if you have further thoughts that were lost on us today, I would appreciate hearing them.

Thanks again,
Debra

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Water Quality Standards website:
<https://www.oregon.gov/deg/wq/Pages/WQ-Standards.aspx>